

1 Blaine R. Cox, State Bar No. 306192
2 bcox@damrell.com
3 DAMRELL, NELSON, SCHRIMP,
4 PALLIOS & SILVA
5 1601 I Street, Fifth Floor
6 Modesto, CA 95354
7 Telephone: (209) 526-3500
8 Facsimile: (209) 526-3534
9
10 *Attorneys for Creditor*
11 *D.A. Wood Construction, Inc.*

12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re: Bankruptcy Case No. 19-30088 (DM)
PG&E CORPORATION, Chapter 11
-and- (Lead Case) (Jointly Administered)
PACIFIC GAS AND ELECTRIC COMPANY,
Debtors. **CREDITOR D.A. WOOD
CONSTRUCTION INC.'S RESPONSE
TO REORGANIZED DEBTOR'S
FORTY-FOURTH OMNIBUS
OBJECTION TO CLAIMS**
□ Affects PG&E Corporation
□ Affects Pacific Gas and Electric Company
☒ Affects both Debts

**All papers shall be filed in the Lead Case, No.
19-30088 (DM)*

COMES NOW, D.A. Wood Construction Inc. ("D.A. Wood"), and files this response ("Response") to the Debtors' Forty-Fourth Omnibus Objection to Claims:

1. The Claim subject to this Response is Claim No. 8627 (the "Claim") in the amount of \$27,009.30 (the "Claim Amount").

2. The Claim Amount was for costs and expenses incurred by D.A. Wood after a gas line owned/operated by Pacific Gas and Electric Company ("PG&E") was broken in the course of construction work. (See Declaration of Josh Malcom In Support of Creditor D.A. Wood Construction Inc.'s Response to Reorganized Debtor's Forty-Fourth Omnibus Objection to Claims ["Malcom Decl."] ¶ 3 [filed concurrently herewith].)

1 3. D.A. Wood contends the Claim Amount was incurred due to PG&E's negligence in
2 marking its gas lines in and surrounding a construction site. (Malcom Decl. ¶ 4.) The Claim
3 Amount was incurred by D.A. Wood for, among other things, immediate action to safeguard and
4 protect the public from PG&E's leaking gas line. (Id.) D.A. Wood is informed that PG&E alleges
5 its agents/employees did mark the gas line at issue, but records submitted by D.A. Wood in
6 support of its Claim refute PG&E's allegation that it is not liable to D.A. Wood for the Claim and
7 Claim Amount. Based on these factual contentions that are currently in dispute, the Court should
8 deny the Omnibus Objection as to the Claim.

9 4. Reorganized Debtors' may serve a Reply to this Response to D.A. Wood's attorneys'
10 of record appearing on the caption page to this Response.

11 5. The individual with authority to reconcile, settle, or otherwise resolve the Omnibus
12 Objection on behalf of D.A. Wood is Josh Malcom, 963 Shepard Ct. Oakdale, CA 95361, (209)
13 491 4970, jmalcom@dawoodinc.com.

14 DATED: December 1, 2020

DAMRELL, NELSON, SCHRIMP,
PALLIOS & SILVA

16 By: /S/ Blaine R. Cox
17 Blaine R. Cox,
Attorneys for D.A. Wood